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*Local Counsel for Defendant Trans Union, LLC*

**UNITED STATES DISTRICT COURT**

## NORTHERN DISTRICT OF CALIFORNIA

**SAN FRANCISCO DIVISION**

JOHNNY WANG, an individual, on his own behalf  
and on behalf of others similarly situated,  
Plaintiffs,

VS.

ASSET ACCEPTANCE, LLC, and  
TRANS UNION, LLC, Delaware limited liability  
companies, and DOES 1-100, inclusive,  
Defendants.

CASE NO. 3:09-cv-04797-SI

## STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE

Plaintiff Johnny Wang, an individual, on his own behalf and on behalf of all others similarly situated (“Plaintiff”) and Defendants, Asset Acceptance, LLC (“Asset Acceptance”) and Trans Union, LLC (“Trans Union”) (collectively, the “Parties”), by counsel, pursuant to

**STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE –**

**3:09-CV-04797-SI**

1 Local Rule 7.12 hereby submit their Stipulation And [Proposed] Order For Continuance of the  
2 Case Management Conference (the “Stipulation”).

3 In support of the Stipulation, the Parties state:

4 1. By Order dated April 23, 2010, the Initial Case Management Conference in this  
5 cause is currently set for Friday, July 9, 2010, at 2:30 p.m.

6 2. The deadline of June 29, 2010, to request that the Court reschedule the Initial  
7 Case Management Conference has not passed.

8 3. Defendant Trans Union became a party to this action when it was served with the  
9 Amended Complaint on or about May 11, 2010, and filed its Answer on May 28, 2010.

10 4. Trans Union has made a good faith effort to review the facts and allegations of  
11 the matters raised by Plaintiff’s Amended Complaint; however, in order to participate  
12 meaningfully in the Conference required by Federal Rule of Civil Procedure 26(f) (“Rule  
13 26(f)”), in drafting the Joint Case Management Statement as required by Local Rule 16-9(a) and  
14 in participating in the Initial Case Management Conference as well as any Court-ordered  
15 mediation of this case pursuant to ADR Local Rule 6, the Parties agree that an additional eight  
16 (8) weeks, or until September 3, 2010, is necessary for the Parties to prepare properly for the  
17 Rule 26(f) Conference, to discuss how to integrate Trans Union into the pending proceedings  
18 and to prepare for any Court-ordered mediation.

19 5. This Stipulation is not made for the purposes of delay and would not prejudice  
20 any party. This Stipulation does not prevent or stay discovery or motion practice.

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**STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE –**  
**3:09-CV-04797-SI**

1 SO STIPULATED by:

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3 Date: June 15, 2010

s/Robert J. Schuckit  
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(admitted Pro Hac Vice)  
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*Lead Counsel for Defendant Trans Union,  
LLC*

10  
11 Date: June 15, 2010

s/Ethan Preston (with consent)  
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*Lead Counsel for Plaintiff Johnny Wang, et  
al.*

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19 Date: June 15, 2010

s/Tomio Buck Narita (with consent)  
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*Lead Counsel for Defendant Asset  
Acceptance, LLC*

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28 STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE –

3:09-CV-04797-SI

**[PROPOSED] ORDER**

Pursuant to the Stipulation of the Parties and for good cause there appearing, IT IS  
HEREBY ORDERED as follows:


1. The Initial Case Management Conference currently scheduled for Friday, July 9,  
2010, at 2:30 p.m., is hereby CONTINUED to Friday, September 3, 2010, at 2:30 p.m., to allow  
the Parties sufficient time to prepare for said Conference and for all other matters preparatory to  
same. This Order does not prevent or stay discovery or motion practice.

2. The time within which mediation must take place is EXTENDED until November  
1, 2010.

PURSUANT TO STIPULATION,

IT IS SO ORDERED.

Dated: \_\_\_\_\_

  
Hon. Susan Illston, Judge  
U.S. District Court  
Northern District of California

STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE –

3:09-CV-04797-SI